



**Division of Environmental Protection
Office of Air Quality**

INSPECTION FACT SHEET

COMPANY NAME: Century Aluminum

EPA ID #: WVR000016469
PLANT ID #: 03-54-035-00002
PERMIT #: n/a

MAILING ADDRESS: P. O. Box 68
Ravenswood, WV 26164

FACILITY TYPE: Large quantity generator, 90 day storage
LOCATION: Ravenswood
COUNTY: Jackson
REGION: 2

COMPANY CONTACT: Richard Thomas
PHONE: (304) 273-6346

PURPOSE: Compliance Evaluation
APPLICABLE REGS: 45CSR25

DATE INSPECTED: July 11, 2000
INSPECTORS: J. D. McClung
R. Boehm

DATE PREPARED: August 29, 2000
PREPARED BY: J. D. McClung
REVIEWED BY: L. S. Pontiveros

FACILITY STATUS CODE: 30
VIOLATIONS: None



INSPECTION MEMORANDUM

DIVISION OF ENVIRONMENTAL PROTECTION

West Virginia Office of Air Quality

Company:	Century Aluminum			Facility:	Ravenswood
Region:	2	Plant ID#:	03-54-035-00002	Regulations:	45CSR25

Inspected By: Jonathan D. McClung

Title: Engineer-in-Training II

Memo Date: August 29, 2000

Inspection Date: July 11, 2000

On July 11, 2000, at approximately 1:00 p.m., the writer and Rich Boehm conducted an unannounced inspection of Century Aluminum located near Ravenswood, WV. The contact person at the facility was Richard Thomas, Environmental Engineer. The inspection consisted of an opening conference and an inspection of the operations at the facility. The weather was cloudy with light breezes and temperatures in the upper 70's (°F). The inspection lasted approximately one hour.

West Virginia Regulation 45CSR25 incorporates by reference, among other things, 40 CFR 265 subparts AA, BB, and CC. The purpose of these subparts is to prevent and control organic air emissions of hazardous waste from process vents, process equipment, and tanks, containers, and surface impoundments, respectively. The purpose of the inspection was to evaluate the applicability and compliance of Century Aluminum with respect to these subparts. Century Aluminum is a large quantity generator of hazardous waste and a ninety day storage facility.

Century Aluminum operates a aluminum production facility. Alumina, a white powder, is converted in reduction "pots" to produce molten aluminum. Various components are added to the molten aluminum and cast into certain alloys of "ingots". Ingots of the aluminum alloys are approximately 20 ft long, 6 ft wide, and 2 ft high. The majority of ingots are sold to Pechiney Rolled Products and processed into coils.

The facility operates one area at the facility for 90 day storage of hazardous waste, which consists primarily of paint and mineral spirits. Century Aluminum exclusively utilizes DOT compliant 55 gallon drums for storage of hazardous waste. The storage areas appeared to be well maintained and each drum was closed during the inspection.

Subpart AA

Subpart AA applies to process vents for hazardous waste equipment associated with

Photographs Taken:	No	ITS Updated:	Yes
Visual Emissions Taken:	No	Facility Status Code:	30

Inspection of Century Aluminum
Inspected on July 11, 2000
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distillation, fractionation, thin-film evaporation, solvent extraction, or air or steam stripping operations. Century Aluminum does not have process vents in hazardous waste service at this facility and is not subject to Subpart AA.

Subpart BB

Subpart BB applies to equipment that contains or contacts hazardous waste with organic concentrations of at least 10 percent by weight. Equipment includes valves, pumps, flanges, and open-ended lines. Century Aluminum does not operate equipment subject to Subpart BB.

Subpart CC

Subpart CC applies to certain tanks, containers, and surface impoundments managing hazardous waste. Century Aluminum does not operate tanks or surface impoundments in hazardous waste service. The containers in hazardous waste service at the facility are subject to Subpart CC. Since no waste stabilization occurs in containers, compliance with Subpart CC can be achieved by utilizing DOT approved containers. Century Aluminum uses DOT approved containers for ninety day storage of hazardous waste and is in compliance with Subpart CC. The DOT codings on the drums indicate that the hazardous waste is compatible with the construction materials and design of the drums. I recommend that the facility be inspected once every three years and whenever the facility alters hazardous waste management practices.

Jonathan D. McClung
Jonathan D. McClung
Engineer-in-Training II

8-29-00

Date

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Century ALUMINUM

Ravenswood
Operations

RECEIVED

April 12, 2000

APR 19 2000

Mr. Kevin Campbell, Environmental Inspector
Office of Waste Management
Compliance Assurance and Emergency Response
2311 Ohio Avenue
Parkersburg, WV 26101

WV DEP
PARKERSBURG FIELD OFFICE

Re: Century Aluminum of West Virginia, Inc.
WVR000016469

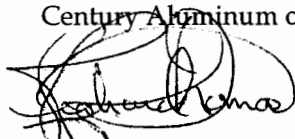
Dear Mr. Campbell:

This letter is in response to the Notice of Violation received from your office on March 21, 2000. Violation 1 states that two roll-off containers were in poor condition and three tubs were not covered. In response, Century Aluminum would like to clarify that one of the boxes had a small gouge, but the waste was still contained by the plastic liner, and regarding the second box, the issue was with the tarp that covered the box. The two roll-off boxes observed have been removed and the transporter has been notified of the problem. They have stated that they will have their yard workers inspect the condition of their roll-off boxes and tarps and repair and replace any problem equipment. Additionally, during training Century will reinforce that tubs containing waste should be covered when personnel leave the area for their breaks.

Violations two and three state that the dust collection bag on the dust handling system should be marked with the start accumulation date and the words "Hazardous Waste". This label, the same as Century Aluminum uses on the tubs, has been applied to the bag. Additionally, Century will add this information to the annual training scheduled for later this month. However, Century Aluminum would like to clarify that the bag in question was in use on the dust handling system and therefore was still "in process". Consequently we believe this situation does not give rise to a violation. In addition, Century Aluminum was interpreting the attached news article on the subject in which EPA was quoted as saying "that bag-house silos fall within the scope of what the Clean Air Act regulations define as dust-handling system (40 CFR 60.271a)". Elizabeth A. Cotsworth, acting director of EPA office of solid waste went on to say "(the silo) serves as part of the dust-handling system and would not be subject to RCRA".

If you have any questions please contact either myself at 304 273 6280, or Jeff VanMatre, Manager of Environmental Affairs, at 304 273 6686.

Sincerely,
Century Aluminum of West Virginia, Inc.



Richard Thomas

cc: T. Fischer, WV-DEP
attachment
Novresponse41200,cf500-003-001-03

Century Aluminum of West Virginia, Inc.
Post Office Box 98
Ravenswood, WV 26164

(304) 273-6000 Phone

A Century Aluminum Company

NEW STEEL*Published September 1998***ENVIROWATCH****By Robert V. Chalfant****EPA: Bag houses aren't hazardous-waste tanks**

The Specialty Steel Industry of North America (SSINA) and the Steel Manufacturers Assn. (SMA) have secured another favorable opinion from the U.S. EPA, the second such ruling this year. SSINA and SMA recently led efforts to resolve a dispute over whether maintenance, upgrades, and minor modifications to EAFs should make steel producers subject to more recent and stringent new-source

performance standards (NSPS). In response to inquiries from John L. Wittenborn and William M. Guerry, legal counsel for the associations, EPA clarified its stance on the issue to ensure that steel mills may continue to make relatively minor improvements to older EAFs without triggering NSPS requirements (*Envirowatch*, August).

The second favorable ruling, which came earlier this summer, effectively exempts bag-house silos from Resource Conservation Recovery Act (RCRA) regulations pertaining to hazardous-waste-storage units. "This ruling represents an important victory for SSINA and SMA," Guerry says. "It significantly benefits those electric-arc-furnace steel producers that face increased enforcement scrutiny regarding bag-house silos from state regulators. It also reduces the risk of a problematic precedent on the issue proliferating to other states."

At issue is the claim by several states that bag-house silos, used to collect and transfer captured emission-control dust from an EAF, constitute an RCRA "hazardous-waste tank"; hence, the silos are subject to problematic design and operational conditions that include leak detection, spill prevention, and secondary containment. The Ohio EPA issued a notice of violation (NOV) to one steel company and directed it to "install secondary containment or cease operation of the bag-house dust tank as a hazardous-waste-accumulation unit."

Bag houses are the part of the EAF's emission-control equipment used to filter out metal fumes and other emissions from the furnace as EAF dust. As the emissions are filtered in the bag house, the EAF dust is collected in hoppers located in the lower portion of the bag house. Many steel mills use bag-house-silo systems to improve the management of EAF dust. Silos, located adjacent to bag houses, receive EAF dust through piping from the bag-house hoppers. The silo serves as a single collection point for the EAF dust and a single discharge point for transfer to trucks or rail cars.

EAF dust normally passes through the bag-house silo in less than 24 hours. Steel mills may

EAF dust normally passes through the bag-house silo in less than 24 hours. Steel mills may generate 25-80 tons of EAF dust per day, while the silos typically can hold only 50-200 tons of EAF dust. Consequently, even under extraordinary circumstances, a bag-house silo doesn't have the capacity to hold the EAF dust for more than a few days. If the company doesn't remove the EAF dust virtually continuously, accumulation will cause steel production at the facility to stop. Such capacity limitations make it impractical to store EAF dust for an extended time; hence, the bag-house silos are used merely to consolidate dust so that it can be discharged from a single exit point.

Wittenborn and Guerry, of the law firm Collier, Shannon, Rill, and Scott, submitted correspondence to the U.S. EPA requesting the agency to confirm that a bag-house silo is an essential part of the dust-handling and transfer system and not an RCRA hazardous-waste tank. The attorneys argued that "air and hazardous-waste regulators have historically treated bag-house silos as part of a single dust-handling system...and not as a separately regulated tank or unit." Their contention was that there was no reason to change what had become a long-standing policy.

EPA believes "that bag-house silos fall within the scope of what the Clean Air Act regulations define as a dust-handling system (40 CFR 60.271a)," said Elizabeth A. Cotsworth, acting director of the EPA office of solid waste, in her response to the inquiry. The silo "serves as part of the dust-handling system and would not be subject to RCRA, (with the understanding) that the purpose of the overall system is dust collection and conveyance, and that the silo contains the EAF dust, which is hard-piped from the bag house, protecting it from environmental impact (ensuring) that there are no releases from the silo to soils or ground water."

The acting director pointed out that the agency would have to analyze any bag-house silo that doesn't fit the description provided to determine whether it truly is an integral part of the dust-handling system and not subject to RCRA. Further, any long-term storage of EAF dust would be indicative of the silos functioning as waste-storage units, thereby making them subject to RCRA regulations, she warned.

Cotsworth didn't elaborate on what the EPA would regard as "long-term storage."

Based in Atlanta, Robert Chalfant is manager, air quality services, Lockwood Greene Technologies. Chalfant has worked for the past 15 years with Lockwood Greene Technologies advising companies on environmental design engineering and permitting. Earlier he worked for nine years for the Georgia Environmental Protection Division, handling permitting and enforcement. If you have questions or comments about the column, feel free to call Bob Chalfant at 404-654-4421 or write him at Inforum, Suite 2350, 250 Williams St., Atlanta, Ga. 30303.

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